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8 **UNITED STATES DISTRICT COURT**
9
10 **DISTRICT OF NEVADA**

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12 PAMELA DITTMAR,

13 Plaintiff,

14 v.

15 CITY OF NORTH LAS VEGAS, a municipal
16 corporation,

17 Defendant.

Case No. 2:17-cv-02916-JAD-BNW

**STIPULATION TO EXTEND
DISPOSITIVE MOTION RESPONSE
AND REPLY DEADLINES**

(Fourth Request)

ECF No. 96

18
19 NOW COMES the Plaintiff, Pamela Dittmar, by and through her attorneys, Melanie A.
20 Hill and Melanie Hill Law PLLC, and Defendant, City of North Las Vegas, by and through its
21 attorneys, R. Todd Creer, Kaitlin H. Paxton, and Kameron Zucker Abbott, who hereby stipulate that
22 the deadlines to file responses to the currently pending dispositive motions be extended from the
23 current deadline of May 7, 2021 up to and including June 11, 2021 and the deadline to file replies be
24 extended from the current deadline of May 28, 2021 up to and including July 2, 2021.

25 This is the fourth request for an extension of the dispositive motion deadline. The first request
26 was by stipulation to extend the dispositive motion deadline thirty (30) days from the extended
27 discovery cutoff deadline to complete the remaining two depositions. The second request was by
28 motion due to Plaintiff's counsel's ongoing illness with Covid-19 symptoms. The third request was

1 due to Plaintiff's counsel's immediate family member's emergency hospitalization for nearly one
2 week. This fourth request is due to Plaintiff's counsel's significant injuries from two separate
3 accidents. This Stipulation is made at the request of Plaintiff's counsel for the reasons set forth
4 herein and this is the fourth stipulation for an extension of the response and reply deadlines.

5 In support of this Stipulation and Order, the parties state as follows:

6 1. The current deadline to file dispositive motions is May 7, 2021. When the parties
7 first entered into a stipulation to extend the dispositive motion deadline, it was to extend the
8 dispositive motion deadline to thirty (30) days from the extended discovery cutoff deadline to
9 complete the remaining two depositions. When the parties next entered into a stipulation to extend
10 the dispositive motion deadline, it was to extend the dispositive motion deadline thirty (30) days
11 due to Plaintiff's counsel's ongoing illness with Covid-19 symptoms. The parties then entered into a
12 stipulation for an additional seven (7) days due to Plaintiff's counsel's family member's health
13 emergency.

14 2. Counsel for Plaintiff reached out to counsel for Defendant over two weeks ago on
15 April 22, 2021 to inform them that she just found out earlier that week that she broke her left ankle
16 and right foot during a fall on April 1, 2021 and the fractures were missed when she sought
17 treatment after her fall and was following up with an orthopedic surgeon. Counsel for the CNLV
18 responded asking for a proposed timeline. Before counsel for Plaintiff could respond, she was
19 injured in a three-car accident the evening on April 22, 2021 wherein she was rear-ended at a stop
20 and her car was pushed into the car in front of her injuring her back and neck from the impacts.
21 Counsel for Plaintiff has been in significant pain from her injuries and has taken a significant time
22 off work to treat her injuries, attend physical therapy, and recover necessitating this stipulation to
23 extend the response and reply deadlines. The parties delayed in filing this stipulation to allow
24 Plaintiff to seek additional diagnostic exams and be able to more accurately estimate her requested
25 extension based on her treatment plan.

26 3. Defendant is sympathetic to Plaintiff's counsel's immediate health and recognizes the
27 difficulties with the same. In that regard, Defendant has entered this stipulation so long as it is not
28 prejudiced in preparing its briefs so the parties have also agreed to extend the response and reply

1 deadlines for both parties.

2 4. The parties have agreed to extend the deadline to file responses to the dispositive
3 motions until June 11, 2021. The parties have further agreed that replies will be due on July 2, 2021.
4 No other deadlines are being extended by this stipulation, such as the deadline for discovery and to
5 file a motion to compel written discovery.

6 5. This stipulation to extend the dispositive motion deadline is brought in good faith,
7 with a showing of good cause, and is not sought for any improper purpose or other purpose of
8 delay, but to allow counsel for the Plaintiff time off from work due to her injuries, allow her time
9 for treatment and physical therapy, and time to heal from her injuries. This extension will allow
10 counsel for Plaintiff the additional time necessary to do so prior to filing her response and reply.

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1 WHEREFORE, the parties respectfully request by this stipulation that the Court extend
2 the deadline to file responses to the pending dispositive motions from the current deadline of May 7,
3 2021 up to and including June 11, 2021. The parties further request that the Court extend the
4 deadline to file replies to the dispositive motions from the current deadline of May 28, 2021 up to
5 and including July 2, 2021.

6 DATED this 7th day of May, 2021.

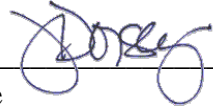
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17 **IT IS SO ORDERED:**

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U.S. District Judge

20 Dated: 5-11-2021
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